

# PUBLIC SUBMISSION

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Dust Retrospective Study

**Comment On:** MSHA-2018-0014-0001  
Retrospective Study of Respirable Coal Mine Dust Rule

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Comment from JUAN GAMEZ BRICENO, NA

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## General Comment

A retrospective study to evaluate one of the common occupational hazardous for miners will allow MSHA, as a regulatory agency, to help reduce the incidence of respiratory issues and lung disease experienced by coal miners due to exposure of respirable coal mine dust. The idea to evaluate miners retrospectively is a great resource to assess exposure levels over time as chronic exposures to respirable coal mine dust can cause severe lung disease that can lead to permanent disability and death and the effects of the respirable coal mine dust many not affect coal miners. Overall, the Dust Rule aims to improve health protections for coal miners by lower exposure through best practices and engineering controls applications, but is this initiative going to be enough protection to coal miners?

MSHA is taking steps to help protect their labor force of occupational hazards, but the issue with respirable coal mine dust is that its effects on the lungs of coal mine workers is not realized quickly, but sometimes over a decade or more when the lung disease manifests clinically. The retrospective study working in conduction with the Dust Rule will be an important contributor to development of new initiatives in lowering exposure for future generations. Unfortunately, this proposed rule does not provide provisions for coal miners currently being affected by respirable coal mine dust. MSHA still has to test the effectiveness of dust control in mines as the Dust rule helps to decrease levels of respirable coal mine dust over time. Great initiative.

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